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DEFENDANTS' EVIDENTIARY SUBMISSION IN SUPPORT OF
MOTION FOR SUMMARYJUDGMENT

Exhibit 1	Complaint Filed on May 27, 2019 (Doc. 1)
Exhibit 2	Amended Answer of Defendant Katie Baker to Plaintiffs' Complaint (Doc. 22)
Exhibit 3	Answer of BuzzFeed Inc. and BuzzFeed News to Plaintiffs' Complaint (Doc. 23)
Exhibit 4	Answer of Ben Smith to Plaintiffs' Complaint (Doc. 24)

Exhibit 5	Article Published June 22, 2017, Complaint Ex. 1 (Doc. 1-1)
Exhibit 6	Email to Mike Rondini Dated December 21, 2016 Buzzfeed04491
Exhibit 7	Email to Tina Susman and Marisa Carroll from Katie Baker Dated December 30, 2016 Buzzfeed00002
Exhibit 8	Email to Katie Baker from Michael Rondini dated December 30, 2016 Buzzfeed04556-04709
Exhibit 9	Email to Katie Baker from Michael Rondini dated January 5, 2017 Buzzfeed04872-04875
Exhibit 10	Megan Rondini's Text Messages Obtained by Michael Rondini Buzzfeed04165-04190
Exhibit 11	Email to Tina Susman from Katie Baker Dated January 13, 2017 Buzzfeed01169-01170
Exhibit 12	Email to Katie Baker from Alex Campbell Dated January 24, 2017 Buzzfeed00027-00029
Exhibit 13	January 24, 2017 Open Records Letters to University of Alabama Police Department and Tuscaloosa County District Attorney from BuzzFeed News Buzzfeed00091-00173
Exhibit 14	Email to Alex Campbell from Katie Baker Dated January 18, 2017 Buzzfeed00020-00026
Exhibit 15	First Draft Article Buzzfeed03815-03825

Exhibit 16	Second Draft Article Buzzfeed03826-03843
Exhibit 17	Third Draft Article Buzzfeed03803-03814
Exhibit 18	Fourth Draft Article Buzzfeed03844-03856
Exhibit 19	Sixth Draft Article Buzzfeed03783-03793
Exhibit 20	Email to Katie Baker from Anna Voremberg Dated February 28, 2017 Buzzfeed01248-01250
Exhibit 21	Email to Masha Kalinina from Katie Baker Dated February 9, 2017 Buzzfeed01236-01239
Exhibit 22	Email to Katie Baker from Linda Ledray Dated March 9, 2017 Buzzfeed01535-01536
Exhibit 23	Notes from Katie Baker regarding her conversation with Hayes Webb, Dated February 14, 2017 Buzzfeed02124
Exhibit 24	DCH Statement Dated February 2017 Buzzfeed00057
Exhibit 25	Email to Katie Baker from Amy Gundelach-Foster dated February 8, 2017 Buzzfeed01211-01213
Exhibit 26	Email to Katie Baker from Bradley Fisher Dated March 3, 2017 Buzzfeed00318-00320

Exhibit 27	Email to Katie Baker from Alex Campbell Dated March 7, 2017 Buzzfeed00325-00366
Exhibit 28	Email to Katie Baker from Alex Campbell containing notes of call with Jonathan Cross Dated March 14, 2017 Buzzfeed00434
Exhibit 29	Email to Katie Baker from Alex Campbell containing notes of call with Gary Hood Dated March 8, 2017 Buzzfeed00371
Exhibit 30	Google comments reflecting proposed edits by Sharmila Venkatasubban Dated April 13, 2017 Buzzfeed02675-02677
Exhibit 31	Email to Sharmila Venkatasubban from Katie Baker Dated April 12, 2017 Buzzfeed05781-05782
Exhibit 32	Medical Records of Megan Rondini Buzzfeed05833-05878
Exhibit 33	Email to Katie Baker from Angelo DellaManna Dated June 6, 2017 Buzzfeed01640-01641
Exhibit 34	Felony Packet drafted by Adam Jones in Case No. 20150702471 against TJ Bunn presented to the Tuscaloosa County District Attorney's Office for Grand Jury Buzzfeed01889-01966
Exhibit 35	Electronic flash-drive containing the May 22, 2018 Video Recording of Megan Rondini Interview, Part 1
Exhibit 36	Electronic flash-drive containing the May 22, 2018 Video Recording of Megan Rondini Interview, Part 2

Exhibit 37	Electronic flash-drive containing the May 22, 2018 Video Recording of T.J. Bunn Interview
Exhibit 38	Email to Casey Shellenberger from Katie Baker Dated June 2, 2017 Buzzfeed05937-05939
Exhibit 39	IACP Sexual Assault Incident Reports: Investigative Strategies
Exhibit 40	Email to TJ Bunn from Katie Baker Dated May 31, 2017 Buzzfeed01589-01671
Exhibit 41	Email to Katie Baker from Gary Hood Dated June 2, 2017 Buzzfeed00465-00466
Exhibit 42	Email to A Jones from Katie Baker Dated June 6, 2017 Buzzfeed01630-01646
Exhibit 43	Email to Katie Baker from Gary Hood Dated June 2, 2017 Buzzfeed00462-00464
Exhibit 44	Email from Katie Baker Dated June 8, 2017 Buzzfeed01656-01659
Exhibit 45	Email to Gary Hood from Katie Baker Dated June 12, 2017 Buzzfeed00556-00567
Exhibit 46	Email to Katie Baker from Gary Hood Dated June 12, 2017 Buzzfeed00538-00539
Exhibit 47	Email to Katie Baker from Gary Hood Dated June 15, 2017 Buzzfeed00596-00598

Exhibit 48	Video Interview Transcript Between Officer Adam Jones, Megan Rondini and Ms. Stewart taken July 2, 2015 (Marked as Exhibit 29 at the Deposition of Adam Jones)
Exhibit 49	Video Interview Transcript Between Officer Adam Jones and Megan taken July 2, 2015 (Marked as Exhibit 30 at the Deposition of Adam Jones)
Exhibit 50	Video Interview Transcript Between Officer Joshua Hastings, TJ Bunn Jr. and Attorney taken July 6, 2015 (Marked as Exhibit 38 at the Deposition of Joshua Hastings)
Exhibit 51	Email to Katie Baker from Mike Rondini Dated February 9, 2017 Buzzfeed05591-05593
Exhibit 52	Email to Dennis Huynh from Marisa Carroll Dated January 25, 2017 Buzzfeed01172-01173
Exhibit 53	Email to Shani Hilton from Marisa Carroll Dated March 7, 2017 Buzzfeed02570
Exhibit 54	Google comments reflecting proposed edits by Sharmila Venkatasubban Dated June 8, 2017 Buzzfeed03202
Exhibit 55	Google comments reflecting proposed edits by Tina Susman Dated February 23, 2017 Buzzfeed02226-02228
Exhibit 56	Google comments reflecting proposed edits by Tina Susman Dated May 11, 2017 Buzzfeed02718-02720

Exhibit 57	Google comments reflecting proposed edits by Tina Susman Dated May 11, 2017 Buzzfeed02713-02716
Exhibit 58	Email to Ben Smith from Katie Baker Dated February 8, 2017 Buzzfeed01223-01224
Exhibit 59	Google comments reflecting proposed edits Dated June 19, 2017 Buzzfeed03399
Exhibit 60	Email to Katie Baker from Ben Smith Dated June 23, 2017 Buzzfeed03731
Exhibit 61	Deposition Transcript of Adam Jones Taken December 7, 2020
Exhibit 62	Deposition Transcript of Joshua Hastings Taken December 8, 2020
Exhibit 63	Deposition Transcript of Gary Hood Taken September 15, 2020
Exhibit 64	Deposition Transcript of Terry Carroll Taken January 19, 2021
Exhibit 65	Deposition Transcript of Lora Hastings Taken December 2, 2020
Exhibit 66	Deposition Transcript of Nicole Jones Taken December 3, 2020
Exhibit 67	Deposition Transcript of Kip Hart Taken September 14, 2020
Exhibit 68	Deposition Transcript of Robert Pastula Taken February 16, 2021

Exhibit 69	Defendants' Rule 26(a)(2) Disclosures and Expert Reports of Det. Carlton R. Hershman and Michael H. Mertz
Exhibit 70	Felony Packet drafted by Thomas Nelson in Case No. 15070229 against Megan Rondini presented to the Tuscaloosa County Sheriff's Office Criminal Investigations Division for the Grand Jury Dated December 21, 2016 (Marked as Exhibit 42 at the Deposition of Thomas Nelson)
Exhibit 71	Tuscaloosa Violent Crimes Unit Standard Operating Procedures (Marked as Exhibit 16 at the Deposition of Lloyd Baker)
Exhibit 72	Pulitzer Prize Announcement for BuzzFeed News
Exhibit 73	Deposition Transcript of Thomas Nelson Taken January 19, 2021
Exhibit 74	Deposition Transcript of Lloyd Baker Taken January 19, 2021
Exhibit 75	Interview Transcript Between Officer Adam Jones and Megan Rondini taken July 2, 2015 (Marked as Exhibit 28 at the Deposition of Adam Jones)
Exhibit 76	Interview Transcript Between Officer Terry Carroll and TJ Bunn Jr. taken July 2, 2015 (Marked as Exhibit 43 at the Deposition of Terry Carroll)
Exhibit 77	Google comments reflecting proposed edits Dated June 8, 2017 Buzzfeed03209

Respectfully submitted,

/s/ John G. Thompson

One of the Attorneys for Defendants

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was electronically filed on this the 15th day of September, 2021, using the CM/ECF system which will send notification to the following. Should the Notice of Electronic Filing indicate that notice needs to be delivered by other means to any of the following, I certify that a copy will be sent via U.S. Mail, postage prepaid and properly addressed.

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